

PUBLIC SUBMISSION

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Draft Chesapeake Bay Total Maximum Daily Load

Comment On: EPA-R03-OW-2010-0736-0001
Clean Water Act Section 303(d): Notice for the Public Review of the Draft Total Maximum Daily Load (TMDL) for the Chesapeake Bay

Document: EPA-R03-OW-2010-0736-0345
Comment submitted by Dwayne D'Ardenne, Street and Landscape Superintendent, City of Roanoke, Virginia

Submitter Information

Submitter's Representative: Dwayne D'Ardenne
Organization: City of Roanoke
Government Agency Type: Local
Government Agency: City of Roanoke Department of Public Works

General Comment

Greetings - My name is Dwayne D'Ardenne, Street and Landscape Superintendent for the City of Roanoke. Our turfgrass nutrient management plan has been voluntarily approved by VDCR for almost 10 years now. In addition, clean water, the soil food web, and environmental stewardship are all fundamental to City Operations. We have been doing our part and will continue to do so in order to help create a healthy Chesapeake Bay and local waters.

Further:

- According to the Virginia Department of Agriculture and Consumer Services, only 1.2% of all nitrogen fertilizer sold in Virginia is for non-farm use. Despite the very low amount of nitrogen sold for non-farm use, turfgrass is treated in the Bay TMDLs as a major contributor to nitrogen runoff into the Bay. Science does not justify that claim.
- University studies have shown that turfgrass, when maintained properly, serves as an excellent filter for stormwater runoff, can be a carbon sink, and captures sediment.
- The Chesapeake Bay Model, the basis for nutrient and sediment reductions required by EPA, has been shown to have extensive flaws in the data it utilizes. EPA even acknowledges this fact. EPA should not move ahead with costly mandates based upon flawed modeling and data. ("EPA has not yet conducted the modeling necessary to estimate the amount of N applied to turf that actually reaches the Chesapeake Bay through runoff or groundwater" (Page 3-127))

I work in the Green Industry because I cherish the environment. The Green Industry has been a willing partner in making environmental progress—and have proven it with actions, time and time again. I appreciate this opportunity for input.

Thanks!

-Dwayne D'Ardenne